

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

David F. O'Connor

Chapter: 13,

BANKRUPTCY NO: 17-17788-ELF

*Order Denying Motion of Nationstar Mortgage
For Modification of Stay*

AND NOW, this _____ day of _____ 2018 upon consideration of the
Debtor's Answer and a Hearing,

IT IS HEREBY ORDERED

That The Motion of Nationstar Mortgage for Modification of Automatic Stay
Is Denied.

SO ORDERED

BY THE COURT

U.S. BANKRUPTCY JUDGE

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re
David F. O'Connor

Chapter: 13,
BANKRUPTCY NO: 17-17788-ELF

**Debtor's Answer to the Motion of
Nationstar Mortgage for Relief from Automatic Stay**

Debtor, by his attorney, Allan K. Marshall, Esq., answers the Motion of Nationstar Mortgage:

1. Admitted the movant is who it claims to be, except that the identity of Mr. Cooper as a part of the Movant's name is an unknown element.
2. Admitted.
3. Admitted.
4. This para states a conclusion of law to which no response is required. Debtor demands strict proof of all the factual averments of this para.
5. This para states a conclusion of law to which no response is required. Debtor demands strict proof of all the factual averments of this para.
6. Denied as characterized. Debtor's payments are almost. Deficiency, if any shall be cured within 30 days, either by payments or a plan to cure by Stipulation.
7. This para states a conclusion of law to which no response is required. Debtor demands strict proof of all the factual averments of this para.
8. This para states a conclusion of law to which no response is required.

9. Denied as characterized. Debtor's payments are almost up- to- date.
10. This para states a conclusion of law to which no response is required.
11. This para states a conclusion of law to which no response is required.

WHEREFORE, Debtor demands a hearing.

FIRST DEFENSE
Less Drastic Remedy

12. Even if the moving party is entitled to the Relief from the Stay, the Stay should not be terminated. The Court should rather grant less drastic Relief by conditioning or modifying the Stay.
13. WHEREFORE, the Debtor requests this Honorable Court to deny the Motion for Modification of the Stay and for such other Relief as the Court deems just and proper.

Respectfully Submitted,

_____/s/_____
Allan K. Marshall, Esq.
Attorney for Debtor

February 18, 2018